



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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October 12, 2021

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *D.J.C.V., et al. v. United States of America*, No. 20-cv-5747 (PAE)

Dear Judge Engelmayer:

This Office represents the government in the above-captioned action. On June 11, 2021, the Court granted the parties' request to stay this action pending settlement discussions and directed the parties to file a status report by October 12, 2021. *See* Dkt. No. 98. The parties write to respectfully request that the stay be continued and that the parties be permitted to provide a further status update to the Court within 60 days. The continued stay is requested because the United States and the group of counsel coordinating negotiations on behalf of plaintiffs and claimants ("Coordinating Counsel") continue to make significant progress in their effort to settle the district court cases nationwide and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior administration. During the current stay period, the United States and Coordinating Counsel continued to meet frequently and narrowed their differences on important elements of the settlement framework. However, due to the scale and complexity of the settlement effort, additional time is needed to reach a final agreement. To facilitate these ongoing discussions, the parties jointly request that this action, including all proceedings and case deadlines, be held in abeyance for an additional 60 days. Accordingly, the parties respectfully request that the stay continue and that they provide the Court with a further status update by December 12, 2021.

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Sincerely,

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Granted. The parties will provide a further status update by December 12, 2021. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
10/12/21